

## Rumrill, Nancy

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**From:** Armand Young FOIA Exemption 6  
**Sent:** Tuesday, September 10, 2013 3:27 PM  
**To:** Rumrill, Nancy  
**Subject:** Fw: Curis Resources Temporary Aquifer Protection Permit

Ms Rumrill;

These questions have never been answered by ADEQ.

Armand

----- Original Message -----

**From:** [Armand Young](#)  
**To:** [rjm@azdeq.gov](mailto:rjm@azdeq.gov) ; [maf@azdeq.gov](mailto:maf@azdeq.gov) ; [Rumrill.Nancy@epamail.epa.gov](mailto:Rumrill.Nancy@epamail.epa.gov)  
**Cc:** [Mayor](#) ; [Council](#) ; [Vallarie.woolridge](mailto:Vallarie.woolridge)  
**Sent:** Monday, December 17, 2012 4:47 PM  
**Subject:** Curis Resources Temporary Aquifer Protection Permit

Richard Mendolia, Project Manager,  
Michael Fulton, Water Quality Division Director,  
Nancy Rumrill, Ground Water Office Representative

There are just so many things wrong with this PTF. The PTF is designed by Curis Resources not to demonstrate hydraulic control of the process but provide them with pre-determined results that favor their position. The 40 foot exclusion zone will not protect our aquifer or groundwater. The lower aquifer where a drinking water well exists at a depth of 600 feet is 1.5 miles from the PTF and will not be protected by this 40 foot exclusion. The pilot well field differs from the design for commercial production. The PTF well field does not include any perimeter wells. As a result, hydraulic control data generated by the PTF is irrelevant. The PTF should mimic commercial production. The Temporary APP was approved without public input. Even if ADEQ has this power, a public agency should seek public input from those people it represents before making a decision that will affect the environment of people living in that area. Remember you do not represent corporations or politicians but the people that live in that area. The proposed POC wells are not properly located or constructed to detect contaminants escaping from the PTF. They are so far away from the injection/extraction well field that they will not detect exceedances during the short life of the PTF. An independent consultant should determine location and construction of the POC wells to detect ground water pollution. Curis should be required to conduct multi-level multi-port sampling near and just outside the PTF injection and extraction well field at several locations to account for all potential groundwater flow direction scenarios. More monitoring wells are needed in a ring around the well field. Standards to ensure proper placement and construction and complete sampling requirements. The first, second and third questions are: Why are the POC wells not properly located to detect contaminants escaping from the PTF? Why did you allow Curis to set up a PTF that differs significantly from a commercial production facility? How is the PTF designed to achieve hydraulic control?

Curis and its predecessors should be required to provide all information they have on possible core holes to ADEQ. ADEQ should require Curis to close all core holes on the State land holdings before work begins. Curis proposed standards set arsenic and sulfate above Safe Drinking Water primary and secondary levels. Additional ALs that should be set for parameters without AWQS include PH, sulfate radio chemicals, TDS, magnesium, sodium and aluminum. ADEQ should require Curis to meet all State Drinking Water Standards throughout the PTF. The PTF should be shut down if any exceedance occurs above these standards. Curis should be required to monitor for Level 1 pollutants bi-weekly and level 2 pollutants monthly by an independent agency paid for by Curis and reporting directly to ADEQ. Curis should have nothing to do with this agency except pay for the services. Curis's proposal for bi-annual testing is a clear indication of their lack of concern for our environment and the residents of Florence. It's very important

that POC wells need to be moved to appropriate locations to get relevant data. ADEQs approval for a single sampling event for mining solutions will not reveal the extent of ground water contamination and the requirements for ground water restoration. Since Curis will be analyzing mining solutions continuously, ADEQ should require sampling data on a monthly basis. The BHP tests show Sulfate levels are 7 times the AL and 12.5 times the original levels back in 1998. These levels are increasing over time and a clear and present danger to children and older adults. Information from ISL mines around the world demonstrate that ground water cannot be restored regardless of the technique used and the time frame. In short ADEQ knows and all evidence from existing and past ISL mines demonstrate that it is not a closed system, hydraulic control is impossible and the rinsing technique has never worked in real practice. The fourth and fifth questions are: What factors made you decide in favor of this PTF? Why are the PTF water quality standards lower than the base line standards of the aquifer and State Water Quality Standards?

In your Public Notice No. 12-48 dated 6/7/12 you listed four equally important demonstrations the mine must make to receive an APP. In reviewing Curis Resources plan for the PTF, the company history and their financial history it is obvious that Curis resources TIP and PTF should have been denied. Here's my reasons why this should have been denied.

1. Technical ability. Curis is a small speculative company. The company has never mined anything let alone a technically complicated ISL mine. The company has no history or memory of mining. The personnel of the company are newly hired, have never mined an ISL operation as a team. HDI provides management and technical services only. None of its associates have ISL mining experience. Only one of the associates has mining experience and that's an open pit mine. Collectively all of the Curis team and consultants have no ISL mining experience as a company or team. We the public are not responsible for letting Curis get information at the expense of our water and environment. This lack of experience causes serious mistakes, witness the acid spill from a mine near Clifton, AZ. It is said this spill was caused by an employee working for a experienced multi-billion dollar corporation and not a bunch of amateurs. Curis Resources inability to answer the 88 deficiencies in their 12/20/2011 application and to top it off they had 69 deficiencies on their PTF application. This demonstrates their lack of technical ability. You are setting up the community of Florence for a disaster. The sixth question is: What made you decide that this conglomeration of people, that call themselves a mining company, have the technical ability to manage and operate an ISL mine?

2. Financial capability. As a company Curis would be classified as a penny stock. Curis is currently operating on a 40 million dollar senior loan. It is using borrowed funds to finance current operations and expenses. As a reminder a senior loan takes precedence over all of the other claims against Curis. Forty million is hardly enough to set up and monitor a test facility that mirrors a real production facility and provides for adequate testing and financial protection for the water providers and citizens of Florence. Curis has already borrowed 16 million against this facility in May 2012. As of 9/30/12 Curis has about 8 million in cash left and will have to borrow additional funds in the near future. It has a accumulated deficit of 40 million with total assets of 38 million. Current ISL operations in other states require a 40 to 80 million bond before operations begin. Clearly Curis does not have the financial resources to fund this bond. Curis has proposed that it would obtain a letter of credit from a US bank but it did not provide any evidence that it had secured one, the amount or any detailed plan to do so. ADEQ has not released any information regarding this performance bond. HDI has no financial responsibility for Curis. Curis has no other operations of any kind that you could attach in case of environmental damage. Surely the water providers and water users in Florence are not protected. The seventh and eighth questions are: What criteria did you use to determine the financial capability of Curis? What are the terms and amount of the performance bond if any?

3. Compliance with Arizona aquifer water quality standards at a point of compliance. There is no new technology that would ensure point of compliance with Arizona aquifer water quality standards. They are using the same old technology that has contaminated aquifers all over the world. Testing is inadequate throughout the PTF. Base line standards of the aquifer have not been measured and Curis is not required to return the aquifer to these standards. ADEQ has permitted Curis to violate the State Safe Drinking Water Standards with this PTF. See the first and second paragraphs for additional information. The ninth question is: How is the PTF designed to ensure compliance with the Arizona aquifer water quality standards at the point of compliance?

4. The facility must be designed and operated to achieve the greatest degree of discharge reduction achievable through the application of BADCT: The technology being used has been used for decades and has shown in all cases to be flawed. Setting up the PTF that does not mirror an actual production facility is a flawed design and will not accurately reflect the actual degree of discharge in the aquifer. The design is flawed and the results will be flawed. The tenth question is: What requirements in this PTF will satisfy this demonstration?

The cause and effect of the PTF on the Florence community and land owners will be significant. If this PTF was in the middle of Phoenix or Scottsdale it would never have been considered. We elected a Mayor and Council in 2012 that are against this ISL operation. As such the majority of people in this community are against the mine. This was the main issue of the election. In 1998 when BHP received approval for a production test facility there was no one living in this area. Currently there are over 2,000 houses, with thousands more to come and thousands of people and children living in this area. You should drive through Anthem @ Merrill Ranch, tour both Union Centers, the hospital and the Safeway shopping center. You will find a modern community that business and home owners have invested hundreds of millions of dollars to add to the beauty and value of the Florence community. This is what you are putting at risk. An ISL mine will never come close to adding this type of value to Florence. Instead it will reduce the value of this community and eventually cause all residential and business development in this area to come to a stand still. If you proceed with this PTF Southwest Value Partners will probably write off their land holdings and move on. They cannot wait another 5 to 12 years for this experiment to be concluded or turn bad. Pulte the builder at Anthem will have to cease building if sales fall due to this ISL mine. People that are in the market for a residence or retirement home will look elsewhere for a home as soon as they discover that an ISL mine is a few miles away. People currently living here do not want to live next to an ISL mine and will slowly leave. Florence competes with all other builders of residences and retirement homes in Arizona and in the US. We will not be competitive with an ISL mine in the center of our town. When a builder leaves he leaves homes and businesses with people in them, jobs that are permanent and an environment that is not contaminated. When a miner leaves he leaves empty buildings with no people in them, no jobs and water, land and an environment that is generally contaminated. Look at the history of mining and mining towns. If you approve this PTF you can sit back and boastfully say that you contributed to the destruction of Florence, AZ. The final two question: Do you have the names and locations of any ISL mines that did not alter the ground water or aquifer after they completed production? Why did you amend the TIP to allow a discharge for more than six months?

On June 27, 2012 I sent you and your agency 8 questions. I have never received answers. You may send your answers to all of my questions at my email address or to my mailing address. I understand that ADEQ will answer all questions submitted during the comment period before the PTF is allowed to begin.

Armand & Kathy Young  
FOIA Exemption 6

## Rumrill, Nancy

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**From:** Arne L Hawkins [FOIA Exemption 6]  
**Sent:** Thursday, August 29, 2013 12:19 PM  
**To:** Rumrill, Nancy  
**Subject:** Underground Injection Permit, Curis

August 29, 2013

Nancy Rumrill, Groundwater Office Representative  
U. S. Environmental Protection Agency  
75 Hawthorne Street  
Mail Code: WTR-9  
San Francisco, CA 94105

RE: Curis Temporary Permit P-106360  
Pending USEPA UIP

Dear Ms. Rumrill,

We are residents of Arizona and live at [FOIA Exemption 6]

We are extremely concerned with the position the ADEQ has taken by issuing a temporary permit to Curis to operate a "test" project on State land in Florence. The ADEQ is charged with protecting the health of the citizens of Arizona when it comes to our most precious commodity which is water. We feel that the ADEQ has failed their responsibility to protect us and now you have a chance to intervene by not approving the UIP needed for Curis to proceed.

These are our concerns which we feel have not been adequately addressed by the ADEQ:

Curis says that the in-situ process of mining is a proven technique and is safe. According to the United States Geological Survey, NOT ONE in-situ mining operation in the United States has restored water quality to pre-mining conditions. Is that clear? Not even one commercial mining operation using the in-situ process has ever left groundwater without some form of contamination. Certainly using the amount of sulfuric acid in our back yard that is proposed by Curis, 5 to 15 billion pounds, either for a test pilot or commercial operation will affect our water quality.

The pilot "test" proposed by Curis doesn't even resemble the actual proposed commercial mining operation proposal. How can we allow a "test" when the "test" does not compare apples with apples? The "test" results will provide no relative conclusions from which a permit for commercial operation can be made. Why then are we considering giving Curis approval for a "test" in the first place?

The proposed time period for monitoring by Curis doesn't fit with the actual time it takes for water quality testing to have any merit. Most of the groundwater contamination will take longer than one year plus one

additional year to appear except directly next to the well sites. As we all know, the ground is fractured in this area and it may take years for any contamination to reach outside the test area. Curis also proposed testing every six months at their monitoring sites. This should be done on a much more timely and consistent basis to properly address any contamination that occurs. Why not every week or month at a minimum? Some of Curis' monitoring wells are too far from the injection sites. Once again, how can you properly monitor water quality when the time it takes for the contamination to occur at this distance is obviously longer than six months or maybe even six years?

Curis says that their proposed "test" will not be at the same level as our groundwater level so the quality of our water cannot be impacted. Johnson Utilities has water wells adjacent to the aquifer Curis has proposed to inject sulfuric acid into. Johnson Utilities is also planning to install additional wells to serve the increase in population in the area. These aquifers will certainly be affected by a pilot "test" or commercial operation.

The water quality standards proposed by Curis do NOT meet the current water quality standards required by our water providers. How can any "test" allow lower standards than what we allow our water providers to maintain? It is ludicrous to think that ADEQ would allow this in the first place, the department charged with protecting our water.

There have been hundreds of test wells drilled in this area. How can we be sure that the injection of sulfuric acid and resulting extraction of acid and copper won't become affected by these wells? We know there are maps showing some of the wells but not all. How can we protect our water without knowing where each well is located and until each well is sealed properly to avoid any chance of contamination? Once again, the land in this area is fractured and any contaminants will seek the path of least resistance which could involve these wells.

Curis has repeatedly used the prior BHP results as proof of a safe mining operation at this same area. However, the "test" from the 1990 pilot of 13 injection wells found the water quality did not meet established water quality standards in 26 separate cases. This is the opposite of proof.


Curis has proposed assurance in the form of a bond to protect this "test". Does this bond protect just the "test" area or outside the "test" area where we live? Does it protect the residents outside the "test" area should there be any form of contamination or spill of acid and to what extent?

We expect the ADEQ to protect the citizens of Arizona. This proposed "test" is nothing but a sham of promises and half-truths. Unfortunately some of our elected officials, representatives, and business owners either don't understand or care about the truth and the long term effects of improper mining to our water and the quality of life

Please protect our future by not issuing the UIP needed for Curis to continue their attempt to mine using an injection of sulfuric acid into our water resource.

Arne Hawkins and Judy Grove

FOIA Exemption 6



## Rumrill, Nancy

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**From:** FOIA Exemption 6 on behalf of Dennis Manning FOIA Exemption 6  
**Sent:** Friday, August 16, 2013 4:26 AM  
**To:** Rumrill, Nancy  
**Subject:** Fwd: Curis' application for for an Underground Injection Permit

Dear Ms. Rumrill,

As residents of Florence,AZ.we have been studying the Florence Copper Project since 2010 and our concern with this mining process with its inadequate controls has grown.

The proposed in situ copper recovery process involves the injection of sulfuric acid into the fractured bedrock that lies below and beside an aquifer that supplies the drinking water for the Town of Florence . Since the ore body and the local drinking water aquifer are in direct hydraulic communication there is sufficient danger that the drinking water will be adversely affected. This danger is magnified because Curis has not demonstrated hydraulic control of the mining solution. In fact Curis insists that it is not necessary for them to demonstrate hydraulic control because BHP Copper had already proved it during a 90 day pilot test in the 1990s, Not only has the available test data from BHP project raised significant questions about their hydraulic control but it appears that significant data from the 1990 project has never been reported to ADEQ nor made know to the public.

Without constant,complete and unerring control of the injected solution contaminants emanating from the mine such as arsenic,heavy metals,radiochemicals and sulfates will flow downgradient into and beneath private land within the Town of Florence. Such contaminants would pose a real and imminent threat to the drinking water that currently serves approximately 83,000 people.

Since Curis has not demonstrated hydraulic control of the injected solution and indicates that this demonstration is not necessary,Curis should not be granted an Underground Injection Permit.

Yours truly,

Dennis and Barbara Manning

## Rumrill, Nancy

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**From:** Harry Oxenhandler **FOIA Exemption 6**  
**Sent:** Thursday, August 15, 2013 9:40 AM  
**To:** Rumrill, Nancy  
**Subject:** Curis mining project proposal

Nancy Rumrill Groundwater Office Representative

U.S Environmental Protection Agency

75 Hawthorne Street

San Francisco, CA 94105

[Rumrill.nancy@epamail.epa.gov](mailto:Rumrill.nancy@epamail.epa.gov)

My name is Harry Oxenhandler and I am a resident of Florence, Arizona.

The purpose of my e-mail is to respectfully request that you rule against the CURIS copper mining project proposal submitted by CURIS Resources, a Canadian-based company.

The literature shows that the techniques that CURIS would use in their project have not at all been proven safe and could, therefore, permanently contaminate our water supply. I am absolutely sure that you, as a Groundwater Office Representative of the United States Environmental Protection Agency, are aware of the global water shortage. Fresh water is **the most precious commodity on the planet**. It is the lifeblood of our fragile human race in that we not only need it to drink but we also need it to grow our food.

I know that, somewhere deep inside, you also know that CURIS does not give a good damn about what happens to the people of Florence, Arizona. Their only interest is in making money. Should their project be allowed to go forth and should the results of their project contaminate our water supply, they would simply close their doors and go back to Canada, where they would essentially be totally immune from prosecution. My question to you is this: Why would you, in good conscience, take a chance with the lives and livelihood and well-being of your own citizens and put us in harm's way for the sake of a foreign company whose stock price is only \$.63 per share and is desperately trying, in a last ditch attempt, to stay afloat?

The citizens of the town of Florence, Arizona, Johnson utilities and local landowners do not want this project to happen. Doesn't that tell you something? We do not want this company to open a mining operation in our community. Does that not carry any weight with you? Why on earth would you vote against the will of the people of that community for the sake of a foreign company does not care what happens to us? They only care about making money. You live in the Bay Area. We **live** in that community. If you were living in our community, I can promise you that you would feel and act very differently. Please consider our point of view in making your decision. We do not want this project to happen! You can protect us from these greedy bastards.

Sincerely yours,

Harry Oxenhandler MD

FOIA Exemption 6

[REDACTED]



## Rumrill, Nancy

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**From:** John Anderson [FOIA Exemption 6]  
**Sent:** Thursday, August 15, 2013 11:56 AM  
**To:** Rumrill, Nancy  
**Subject:** Florence Copper Project (Florence, AZ.)

You may have heard that the Arizona Dept. of Environmental Quality approved a temporary permit for Curis Resources to perform In-situ copper mining testing on a parcel of land that they are leasing from the State of Arizona. Our hope is that the EPA will not approve a testing permit which will contaminate our water supply.

The Merrill Ranch Home building which includes the Curis Resource properties has increased as the Town of Florence recently approved multiple plats for developers of for approximately 1,000 homes. New home permits are ramping up monthly. According to the economic news for Arizona, our new home building is currently being limited only by the availability of skilled labor.

The Merrill Ranch plats are approved urban plans that calls for 32,000 homes and is inclusive of the area Curis owns and encompasses the Arizona State leased land which Curis is requesting to begin the In-situ testing. The Curis request to rezone their property was denied by the Town of Florence. It makes no sense for Curis to continue efforts to test or to mine on the small plat that is being leased from the State of Arizona. EPS historical data on In-situ mining shows that this mine and/or tests will contaminate our water supply.

Please help us protect our water supply by denying all requests from Curis for In-situ mining and/or testing of any such mining. Is there anything we citizens can do to influence the EPA to deny the request for In-situ mining on property which is adjacent to our homes and our local water wells?

Thank you for your past communications concerning the Florence Copper Project. I would appreciate any updates on this project.

Regards,

*John Anderson*

[FOIA Exemption 6]

## Rumrill, Nancy

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**From:** Judith Freeman [FOIA Exemption 6]  
**Sent:** Wednesday, August 14, 2013 11:19 AM  
**To:** Rumrill, Nancy  
**Subject:** Curis mining in Florence AZ

I'm sure you are well aware of the plight of the people of Florence, AZ. Please don't let this "bully company" take unfair advantage of our precious town. Right now we have good clean water, I hope it remains so for my grandchildren. The mine company will do their dirty deed and move on to another town, not giving two hoots what happens to us. I'm begging you to help us from letting this happen. Thank you for your consideration. Judith Freeman, [FOIA Exemption 6]  
[REDACTED]

## Rumrill, Nancy

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**From:** Karen & John Wall [FOIA Exemption 6]  
**Sent:** Friday, February 22, 2013 10:43 AM  
**To:** Rumrill, Nancy  
**Subject:** Re: Curis Resources/Florence Copper

Good Morning Nancy:

Thank you for sending the RFI that was sent to Curis in November 2012.

Take care,

Karen Wall

On Thu, Feb 21, 2013 at 4:26 PM, Rumrill, Nancy <[Rumrill.Nancy@epa.gov](mailto:Rumrill.Nancy@epa.gov)> wrote:

Hi Karen,

I am sorry I have not replied yet. I am not sure when we talked last because I get a number of inquiries on this project. The last EPA letter sent to Curis Resources (Arizona), Inc. to request information was on November 8, 2012 (see attachment). Curis Arizona provided a response on December 14, 2012, for which we are continuing our technical review process of the application.

Sincerely, Nancy Rumrill

USEPA, Region IX

Ground Water Office

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**From:** Karen & John Wall [FOIA Exemption 6]  
**Sent:** Thursday, February 21, 2013 1:32 PM

**To:** Rumrill, Nancy  
**Subject:** Curis Resources/Florence Copper

Hello Again Ms. Rumrill:

I haven't heard back from you regarding my email of January 23 (below) and I was wondering if perhaps it was lost in what must be an immense number of emails. I would greatly appreciate knowing the status of the Curis Resources application for an Underground Injection Control permit.

Thank you in advance for your reply.

Karen Wall

FOIA Exemption 6

----- Forwarded message -----

From: **Karen & John Wall** FOIA Exemption 6  
Date: Wed, Jan 23, 2013 at 11:46 AM  
Subject: Curis Resources/Florence Copper  
To: Rumrill Nancy <[rumrill.nancy@epamail.epa.gov](mailto:rumrill.nancy@epamail.epa.gov)>

Hello Ms. Rumrill:

The last time we spoke, you indicated you were preparing another request for information from Curis Resources because they had not responded satisfactorily to your initial request.

Has the second letter been sent and, if possible, could you please send me a copy?

As I'm sure you know, the Arizona Dept. of Environmental Quality is reviewing public comments before determining whether to confirm, modify or rescind the temporary individual permit they issued in August for a pilot test facility on the small State land parcel. There was significant verbal and written opposition to the temporary permit. Curis still doesn't (and hopefully never will) have the zoning necessary to operate on the parcel within Florence Town limits.

Any update you can provide on the UIC will be greatly appreciated.

Karen Wall  
FOIA Exemption 6

FOIA  
Exemption 6

Sent from my iPhone

## Rumrill, Nancy

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**From:** Karen & John Wall [FOIA Exemption 6]  
**Sent:** Thursday, February 21, 2013 1:32 PM  
**To:** Rumrill, Nancy  
**Subject:** Curis Resources/Florence Copper

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Karen Wall  
[FOIA Exemption 6]

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**From:** Karen & John Wall [FOIA Exemption 6]  
**Date:** Wed, Jan 23, 2013 at 11:46 AM  
**Subject:** Curis Resources/Florence Copper  
**To:** Rumrill Nancy <[rumrill.nancy@epamail.epa.gov](mailto:rumrill.nancy@epamail.epa.gov)>

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Any update you can provide on the UIC will be greatly appreciated.

Karen Wall  
[FOIA Exemption 6]

Sent from my iPhone

## Rumrill, Nancy

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**From:** Karen & John Wall [FOIA Exemption 6]  
**Sent:** Wednesday, January 23, 2013 10:47 AM  
**To:** Rumrill, Nancy  
**Subject:** Curis Resources/Florence Copper

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Any update you can provide on the UIC will be greatly appreciated.

[FOIA Exemption 6]  
[Redacted]  
[Redacted]

Sent from my iPhone

## Rumrill, Nancy

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**From:** karen shoppell [FOIA Exemption 6]  
**Sent:** Tuesday, August 20, 2013 6:04 AM  
**To:** Blumenfeld, Jared; Rumrill, Nancy  
**Cc:** Karen Wall  
**Subject:** Curis Resources, Florence Copper Project UIC permit request

I am writing this letter because my husband and I adamantly oppose the Florence Copper Project and do not wish to see them obtain the UIC Permit that they have requested.

We are residents of the town of Florence living within three miles of the proposed mine.  
The insitu process for copper extraction has never been done in the United States.  
The insitu process for extraction of other minerals has never returned the water quality to the level prior to the mining.  
Curis Resources has no experience with in-situ mining for copper.  
Curis Resources had limited financial ability to protect the environment and the water in the event of an environmental accident.  
Curis Resources has not met the requirements of the EPA to issue the permit.  
Curis has not met the requirements of the ADEQ.  
The opposition is growing as surrounding communities and state and local groups join in opposing this potentially hazardous project.

Please protect the taxpayers who pay your salary not Curis Resources.

Karen and Michael Shoppell  
[FOIA Exemption 6]



## Rumrill, Nancy

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**From:** Marilyn & Joe Callahan [FOIA Exemption 6]  
**Sent:** Sunday, August 25, 2013 5:00 PM  
**To:** Rumrill, Nancy  
**Subject:** Curis permit application number AZ396000001

Dear Ms. Rumrill:

I am writing to you about Curis Resources UIC aquifer exemption and permit application number AZ396000001.

Need I remind you ...

Phoenix, AZ – May 19, 2008, reported by the *Arizona Republic*, “Motorola, Inc., Siemens Corp. and GlaxoSmithKline will collectively pay a \$500,000 civil penalty for system failures that led to the release of trichloroethylene, TCE, into the public drinking water system in Scottsdale, Arizona, the Justice Department and the U.S. Environmental Protection Agency announced today.”

Ronald Tenpas, Assistant Attorney General for the Justice Department’s Environment and Natural Resources Division went on to state “These three companies failed to properly treat groundwater for TCE at the site and further failed to alert proper authorities about the release despite being under an agreement to do both.”

Phoenix, AZ – October 19, 2011, Channel 5 News reported: “a report by the federal and state environmental regulators found that companies have made progress in removing a hazardous industrial solvent from groundwater in Scottsdale, but that the cleanup will take **decades** to complete. The *Arizona Republic* reports that the five-year review on reducing trichloroethene from groundwater at the North Indian Bend Wash site is estimating a 70-year cleanup time. The report says facilities have treated **82 billion gallons of contaminated groundwater** and have removed more than 75,000 pounds of the solvent and other compounds.”

Phoenix, AZ – January, 2012, KPHO (Channel 5) reported that while Motorola, GlaxoSmithKline and Siemens have helped pay for treatments to remediate contaminated groundwater covering a 10-square-mile area, people are reporting illnesses from the soil vapors that are now rising. Also, the rate of cancer is higher in that area per population than elsewhere.

Mines in Arizona already have grandfathered rights to pump massive amount of groundwater and are exempt from numerous provision of environmental laws. SB1287 aquifer protection permits: waste “provides exemptions related to the aquifer protection permit program, the groundwater management act, and stormwater discharge programs. Mining companies release more toxics than any other industry in our state and have contaminated our waters and land. Each of which have left the public with significant liabilities.

While all the above was not due to in-situ copper mining, which Curis is proposing in the middle of the Town of Florence, the fact remains that this all happened due to system failures. Curis, like the aforementioned companies has promised that their mining efforts will be safe. They cannot prove it! While such operations were originally approved by state governmental bodies and the EPA, there have been hundreds of mining accidents in this country which have endangered the health and lives of our citizens. **We, the citizens of Florence, who live within walking distance of this risky proposed mining operation have stated, loud and clear, on numerous occasions, we do not wish to become the victims for the almighty dollar.** Our decision is made based on copious research.

Albert Einstein said: “Insanity is doing the same thing over and over and expecting different results.” Based on history, the scientific evidence and the desires of Town Council of Florence, local Indian communities, the Home Builders Association of Central Arizona, the Central Arizona Association of Governments, the Pinal Partnership, John Utilities and many hundreds of Florence residents, the EPA’s approval of this project would be the definition of insanity.

Considering the health risks involved with possible water contamination and/or spillage from trucks hauling acids, the strong possibility of leakage from the cement casing and water consumption in our water-poor land, it would seem you have no alternative but to **deny the permitting to Curis.**

Thank you for taking the time to consider all I have had to say.

Marilyn Callahan FOIA Exemption 6

" Never doubt that a small group of thoughtful, committed citizens can change the world; indeed, it's the only thing that ever has." Margaret Mead

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**Marilyn**

" Never doubt that a small group of thoughtful, committed citizens can change the world; indeed, it's the only thing that ever has." Margaret Mead

## Rumrill, Nancy

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**From:** Marilyn & Joe Callahan [FOIA Exemption 6]  
**Sent:** Sunday, August 25, 2013 4:54 PM  
**To:** Rumrill, Nancy  
**Subject:** Curis Resources Permit Application AZ396000001

Dear Ms. Rumrill:

I have, over a recent period of time, received communication from people who are currently in the United Kingdom, Budapest, Canada, Alaska, Hawaii, Colorado, Northern California, Washington, Oregon, Wisconsin, Minnesota. What do these people have to do with the above referenced? They are residents, as am I, of Sun City Anthem, Florence, Arizona who are vehemently opposed to the EPA granting a permit to Curis Resources to do in-situ copper mining within walking distance of our homes. We all moved to Florence for many reasons which did not include a copper mine in the middle of what we thought would be a united residential community.

Why are we so opposed? After hundreds of hours of research, it becomes apparent that such a mine would pose great risk to the residents of Florence. The ADEQ appears to ignore the wishes of the community by granting a temporary permit to Curis. Based not only on considerable research, but experiencing having other Superfund sites in our area, it appears ADEQ is permitting Curis not to test, but to experiment. Experimenting, according to the dictionary, is testing to find something out. Since there are no in-situ mines for copper in operation anywhere, we are in the position of "just finding these things out". Where in-situ mining has occurred for uranium, there have been disastrous results to **the** public's drinking water supplies. **The There is no proof that in-situ mining is safe. We do not wish to be experimental guinea pigs.** Our grassroots conclusions are also supported by the Town Council of Florence, the local Indian communities, the Home Builders Association of Central Arizona, the Central Arizona Association of Governments, the Pinal (County) Partnership, and Johnson Utilities.

In addition to the health risks, there is also concern about possible spillage from trucks hauling acids and leakage from the cement casings for the wells. And, then, there is also the question of the billions of gallons of water consumption in an area that has been involved in a drought for years...and many years to come. Everyone is aware of the water "wars" between Arizona, California and Nevada for the Colorado River water, which is rapidly diminishing. Where is all this extra water to come from? One day will we be saying "Not A Drop To Drink" because someone says: "Sorry, we made a mistake"?

It amazes me how we, as a species, can ignore what abundant research shows if it supports the dollar. Water is our life's blood. As Waylon Jennings sings: "There is no right way to do a wrong thing!" Do you believe the will of the people, particularly when their desires have been well researched, should be ignored? At this time, **the ball is in your court.** I implore you not to let us down.

Joseph A. Callahan

FOIA Exemption 6

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## Rumrill, Nancy

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**From:** Markalita Cluff [FOIA Exemption 6]  
**Sent:** Friday, June 21, 2013 11:36 AM  
**To:** Rumrill, Nancy  
**Subject:** Permit Request AZ 396000001

**Importance:** High

Dear Ms. Rumrill,

I am writing in reference to a permit submitted by Curis to open the Florence Copper Mine in Florence, Arizona.

My husband, Joe and I are residents of Sun City Anthem, Merrill Ranch, in Florence, Arizona. The community of Sun City consists of an aging population with age-related health problems. That said, we certainly shouldn't have to think about potential exposure to dangerous elements, chemicals, or poisons in our water.

We, along with our friends and neighbors have been fighting against this copper mine since Curis came in and tried to start it up. Curis doesn't care what we want; Curis doesn't care that the Town of Florence has a master plan in place for the Town's expansion; and, Curis certainly could not care less about the residents' health here in Florence.

Curis has repeatedly used deceptive tactics in order to get this mine open and running. They have been trecherous, scandalous and have no intention of following the rules or laws as witnessed by past behavior.

There is no way that we, the people, want to allow Curis to inject acid or any other substance into our ground water which would release poisonous heavy metals among other dangerous things.

**As you are aware, once the poison is discovered in the water system it is too late - we will have been poisoned already. How does one reverse that critical error.**

Please consider whether you would want your parents, siblings, children, grandchildren to drink or bathe in water from Florence after Curis begins drilling at the Florence Copper Mine.

Very truly yours,

Markalita Cluff  
[FOIA Exemption 6]

## **Rumrill, Nancy**

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**From:** FOIA Exemption  
**Sent:** Tuesday, August 20, 2013 8:51 AM  
**To:** Rumrill, Nancy  
**Subject:** CURIS!

Please help us? We do not want this in our neighborhood. Would you want it in your immediate area? It will be very detrimental to our health. We need your help? Thank You.

## Rumrill, Nancy

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**From:** ROBERT JORGANNE COCHRAN FOIA Exemption 6  
**Sent:** Sunday, August 18, 2013 10:47 AM  
**To:** Blumenfeld, Jared; Rumrill, Nancy  
**Subject:** Florence Copper Project

Mr. Blumenfeld and Ms. Rumrill,

As citizens of Florence, Arizona, we are writing to advise you of the danger which exists for all residents of the town should the Florence Copper Project be given a permit to proceed with their in-situ mining of copper.

The proposed pilot site is located ***within the town*** and is not designed to give adequate measurements of back flow of harmful chemicals into the aquifers which provide our drinking water. The monitor wells are too far from the actual acid injection wells to show movement of the resulting acid flume during the two year pilot time frame. The aquifer travels in a Northwestern direction and there is a very large development just three miles in that direction from the Florence Copper Project Site. The development includes homes, a hospital, and schools which would be affected adversely.

The Florence Copper Project has actually stated that there will indeed, be an acid flume from the test injection period. The acid injected during the pilot period will make the later amount during full operation, seem miniscule if the company is allowed to proceed. We realize that flumes of this nature take years to travel, however eventually residents in the area will pay a price with their health and water quality simply so that this company can achieve financial gain.

We, therefore, implore you to deny the FCP a permit. Please do not allow this company to play Russian roulette with our health and that of future generations. As U.S. citizens, we look to you to protect us and the environment in which we live and to provide for the greater good.

Jorganne and Robert Cochran  
FOIA Exemption 6

## Rumrill, Nancy

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**From:** Ruth Wlozczewski FOIA Exemption 6  
**Sent:** Thursday, August 15, 2013 4:29 PM  
**To:** Rumrill, Nancy  
**Subject:** Curis Resources Mining Proposal Florence Arizona

Dear Ms. Rumrill,

I am a resident of Florence, Arizona and oppose the Florence Copper Project and/or the Pilot Test Facility (PTF) on the State land located in the middle of our Town.

We believe the threat of water contamination from sulfuric acid injected into the ground and thus the mobilizing of other contaminants is very real. Curis will be injecting their acidic solution into the oxide bedrock zone that exists at the same depth of the lower aquifer where ground water is used for drinking purposes. This is an experiment with our water at risk. This would be the first in-situ copper mine in the U.S., and no other in-situ mine of any kind has been able to restore ground water to pre-mining conditions once the ore reserves were exhausted.

Curis' proposed monitoring wells are located so far away from the injection/extraction well fields that they will not detect any exceedances during the relatively short life of the PTF. Also, the process solution monitoring is inadequate. Curis fails to provide adequate financial assurance the funds are available for closure, cleanup and remediation.

Respectively,

FOIA Exemption 6  
[Redacted]